



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 14, 2007

Reply To
Attn Of: ETPA-088

Ref: 05-039-BPA

Mickey Carter, Environmental Protection Specialist
Bonneville Power Administration
P.O. Box 3621, KEC-4
Portland, OR 97208-3621

Dear Mr. Carter:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for **Chief Joseph Hatchery Project** (CEQ No. 20070174) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The EIS describes a Chinook salmon hatchery production program sponsored by the Confederated Tribes of the Colville Reservation (Colville Tribe). The proposed action is to build a hatchery near the base of Chief Joseph Dam on the Columbia River for incubation, rearing and release of summer/fall and spring Chinook salmon. Three existing irrigation ponds, one existing salmon acclimation pond, and two new acclimation ponds on the Okanogan River would be used for final rearing, imprinting and volitional release of Chinook smolts. The facilities would produce salmon to sustain tribal ceremonial and subsistence fisheries and enhance the potential for a recreational fishery for the general public.

We support the Colville Tribe's desire to sustain tribal ceremonial and subsistence fisheries and their interest in returning natural Chinook salmon runs to the Okanogan River basin. We also support the use of NATURES criteria for rearing and the mitigation measures that will be implemented to address non-target and ESA-listed species that may be taken incidentally during harvest operations.

The EIS provides some information on the current water quality conditions at the proposed facilities' sites; however, information for some of the facilities is incomplete. In addition, while the document states that actions will be taken to comply with all applicable water quality standards, it does not provide information that demonstrates that applicable water quality standards will be met at all the proposed facilities. We have discussed these concerns in detail in our enclosed comments.

We have assigned a rating of EC-2 (Environmental Concerns - Insufficient information) to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this EIS. If you would like to discuss these comments in detail, please contact Mike Letourneau at (206) 553-6382.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

Enclosure

Chief Joseph Hatchery Program Detailed Comments

Water Quality

The EIS indicates that the project will be subject to Colville Tribal and Washington State water quality standards (WQS). However, the document does not discuss which standards will be applicable to the various components of the project (e.g., hatchery, rearing ponds). The EIS needs to include a clear discussion on the appropriate Tribal and state WQS that apply to the different components of the proposed project. It would be advantageous to present the WQS in a table format for comparison purposes.

The Okanogan River is on Washington Department of Ecology's (WDOE) Clean Water Act (CWA) Section 303(d) list of impaired and threatened water bodies for failure to meet temperature, dissolved oxygen (DO) and pH water quality standards. In addition, the EIS states that total dissolved gas (TDG) and temperatures of the Columbia River in the vicinity of the proposed hatchery exceed WDOE water quality standards, and Columbia River water that supplies all three proposed hatchery water sources exceed recommended pH and aluminum hatchery use criteria. However, it is not clear whether this area of the Columbia River is also CWA Section 303(d) listed as impaired or threatened and whether the elevated pH and aluminum concentrations would exceed WQS when discharged.

The EIS states that water discharged from the hatchery into the Columbia River, at times may be a different temperature than the receiving water. It further states that the discharge water is expected to rapidly mix with the river water and the effect would be negligible. Also, the document discusses how solar heating of rearing and acclimation pond water could occur and when returned to their appropriate streams, would mix quickly so thermal effects would be very minor and confined near the outlet pipes. While the document states that the rearing ponds are monitored and currently meet applicable National Pollution Discharge Elimination System (NPDES) permit requirements it does not discuss whether similar impacts can be expected from the newly constructed ponds or if proposed modifications to existing ponds will continue to meet NPDES permit requirements.

The EIS needs to clearly state whether the Columbia River in the vicinity of the proposed hatchery is CWA Section 303(d) listed for any water quality criteria and whether the elevated pH and aluminum concentrations in the water proposed for use at the hatchery, will meet applicable WQS when discharged. In addition, the EIS needs to provide accurate estimates of the water quality components for the discharges at all of the rearing and holding ponds, and the proposed hatchery. The EIS should evaluate the ambient water quality at the discharge points for the proposed facilities and the discharges from similar facilities in place elsewhere, and demonstrate that the proposed facility discharges will meet applicable water quality standards.

Discussions in the EIS indicate that while low, there is the potential to exceed nutrient WQS as a result of decomposition of large numbers of salmon carcasses in streams and rivers. In addition, there is the potential that returning salmon may contain concentrations of polychlorinated biphenyls (PCBs) and persistent chemicals such as the pesticide DDT, and that

decomposing salmon carcasses may result in elevated concentrations of these persistent contaminants. While the EIS states that adjustments in the program would be made if either of these issues degrade water quality, it does not indicate what monitoring will be performed to determine whether water quality is degraded. The EIS should discuss what kind of monitoring (e.g., ambient water, salmon tissue) will be conducted to evaluate potential nutrient and persistent contaminant impacts.

Water will be diverted from the Okanogan River and Omak Creek for use at the acclimation ponds. These diversions will reduce Okanogan River flows about 4% to 6% at the bypass reaches. The EIS should discuss the impacts the decreased flow will have in the vicinity of the bypass reaches and demonstrate that water quality standards, in particular beneficial uses will be met despite the reduced flows.